



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John J. McConnell, Treasurer
Rhode Island Political Action Committee
750 Elmgrove Avenue
Providence, RI 02906

OCT 4 2006

Identification Number: C00307991

Reference: May Monthly Report (4/01/00-4/30/00)

Dear Mr. McConnell:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide the total(s) for Line 19, Column A of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$6,699.32 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$3,419.36 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.